

Attorneys at Law

41000 Woodward Avenue, Suite 200 East Bloomfield Hills, MI 48304 Phone: 248.205.3300 Fax: 248.205.3399

Matthew G. Berard Direct: 1.248.205.3348 Email: matthew.berard@bowmanandbrooke.com

February 2, 2021

The Honorable Nicholas G. Garaufis **United States District Court** Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Wang v Tesla, Inc.: 1:20-cv-3040-NGG-SJB;

> Submission of Stipulation to Establish Briefing Schedule on Plaintiffs' Motion for **Leave to File Second Amended Complaint**

Dear Judge Garaufis:

Plaintiffs and Tesla, Inc. respectfully requests that this court establish a briefing schedule pertaining to Plaintiffs' recently filed Motion for Leave to file Second Amended Complaint (dkt. 42) filed on January 21, 2021 and submits the enclosed stipulation for this Court's consideration.

Specifically, the parties agree that Tesla's response be due on February 18, 2021 with Plaintiffs' reply due on March 18, 2021.

Wherefore, Tesla respectfully requests that this Court enter the enclosed stipulated order to establish a briefing schedule and order that Tesla's response be due on February 18, 2021 and Plaintiffs' reply be due on March 18, 2021.

Sincerely,

BOWMAN AND BROOKE LLP

Matthew G. Berard

MGB/kt